

Remarks

Claims 1-29 and 38-46 are currently pending in the Application and Claims 30-37 and 47-60 are withdrawn without prejudice from consideration by the Examiner.

Allowable Claims

Applicants acknowledge with gratitude the Examiner's indication of allowability as to Claims 9-11, 20-24, 28-29 and 40-45.

Summary of claim amendments

This response amends Claims 8 and 11 to recite to clarify the language of the claims. No new matter has been added.

Claim objections

The Examiner objects to Claims 8 and 11 for allegedly not providing sufficient antecedent basis for "each repetition" as recited in Claim 8 and for "the optimal element placement information" as recited in Claim 11. Applicants submit that Claims 8 and 11 have been amended and request that the objections be withdrawn.

35 U.S.C. §102(b) rejection in view of Date (U.S. Patent No. 5,144,563)

Claims 1-4, 7-8, 11-18, 25 and 38-39 stand rejected under 35 U.S.C. §102(b) as being anticipated by Date. Applicants respectfully disagree.

The Examiner is reminded that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131 quoting *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The Examiner is also reminded that "[the] identical invention must be shown in as complete detail as is contained in the ... claim." MPEP 2131 quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). Applicants submit that the Examiner has not shown that Date teaches each and every element as set forth in the rejected claims. In particular:

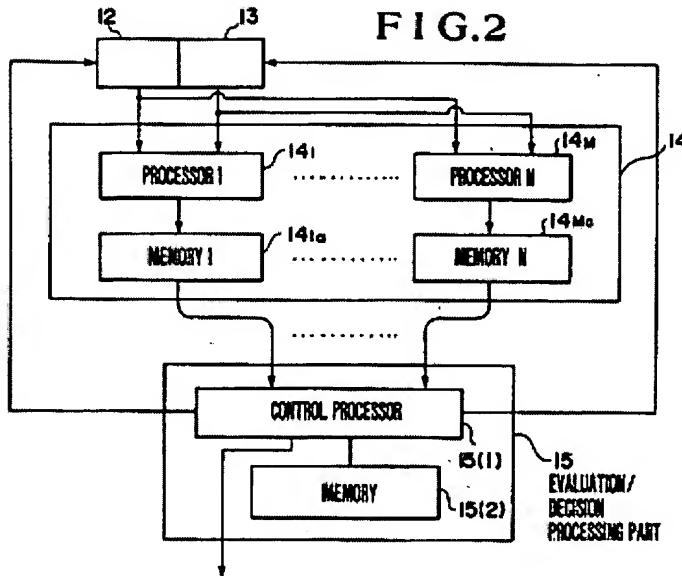
Claim 1

Applicants submit that the Examiner has not shown that Date discloses, suggests or teaches, *inter alia*, the following features recited by Claim 1 of the present application:

“each processing unit of the plurality of processing units being able to **communicate** with one or more neighboring processing units of the plurality of processing units” (emphasis added)

The Examiner asserts that “each processing unit of the plurality of processing units being able to communicate with one or more neighboring processing units of the plurality of processing units” as recited in Claim 1 is disclosed by Date’s column 5, lines 4-5. See page 2, last paragraph of the Official Action. Applicants respectfully traverse the Examiner’s assertion.

Date discloses processors “14(1)...14(M).” See Date’s Figure 2 reproduced below. According to Date’s Figure 2, processors “14(1)...14(M)” are not interconnected and are unable to communicate with one another. Because Date’s processors “14(1)...14(M)” are unable to communicate with one another, Date does not teach, disclose or suggest “each processing unit of the plurality of processing units being able to **communicate** with one or more neighboring processing units” (emphasis added) as recited in Claim 1.



Hence, Claim 1 is patentable over Date and should be allowed by the Examiner. Claims 2-4, 7-8, 11-18 and 25, at least based on their dependency on Claim 1, are also believed to be patentable over Date.

If the Examiner does not agree with Applicants interpretation of Date, the Examiner is encouraged to comply with 37 C.F.R. §1.104(c)(2) and “designate as nearly as practicable” where Date discloses that the processors “14(1)...14(M)” are able to communicate with one another.

Claim 38

Applicants submit that the Examiner has not shown that Date discloses, suggests or teaches, *inter alia*, the following features recited by Claim 38 of the present application:

“determining whether to **exchange, between the processing unit and the pairing processing unit, the elements associated with the processing unit and the pairing processing unit**” (emphasis added)

As stated above, Date’s Figure 2 shows processors “14(1)...14(M)” that are not interconnected and are unable to communicate with one another. Because Date’s processors “14(1)...14(M)” are unable to communicate with one another, Date’s

processors “14(1)...14(M)” are unable to “exchange ... the elements associated with the processing unit and the pairing processing unit” (emphasis added) as recited in Claim 38.

Hence, Claim 38 is patentable over Date and should be allowed by the Examiner. Claim 39, at least based on its dependency on Claim 38, is also believed to be patentable over Date.

If the Examiner does not agree with Applicants interpretation of Date, the Examiner is encouraged to comply with 37 C.F.R. §1.104(c)(2) and “designate as nearly as practicable” where Date discloses that the processors “14(1)...14(M)” are able to “exchange ... the elements associated with the processing unit and the pairing processing unit” (emphasis added) as recited in Claim 38.

35 U.S.C. §102(b) rejection in view of Scepanovic (U.S. Patent No. 6,292,929)

Claims 1-8, 12-19, 25-27, 38-39 and 46 stand rejected under 35 U.S.C. §102(b) as being anticipated by Scepanovic. Applicants respectfully disagree.

Claim 1

Applicants submit that the Examiner has not shown that Scepanovic discloses, suggests or teaches, *inter alia*, the following features recited by Claim 1 of the present application:

“each processing unit of the plurality of processing units being able to **communicate** with one or more neighboring processing units of the plurality of processing units” (emphasis added)

The Examiner asserts that “each processing unit of the plurality of processing units being able to communicate with one or more neighboring processing units of the plurality of processing units” as recited in Claim 1 is disclosed by Scepanovic’s column 15, lines 57-59 and column 19, line 29. See page 4, last paragraph of the Official Action. Applicants respectfully traverse the Examiner’s assertion.

Although Scepanovic’s column 15, lines 57-59 referred to by the Examiner discloses

multiple processors, Scepanovic does not disclose that these multiple processors are able to communicate with each other. On the contrary, Scepanovic specifically shows in Figure 55, reproduced below, multiple processors “1472, 1472” that are not connected to each other and that are unable to communicate with each other.

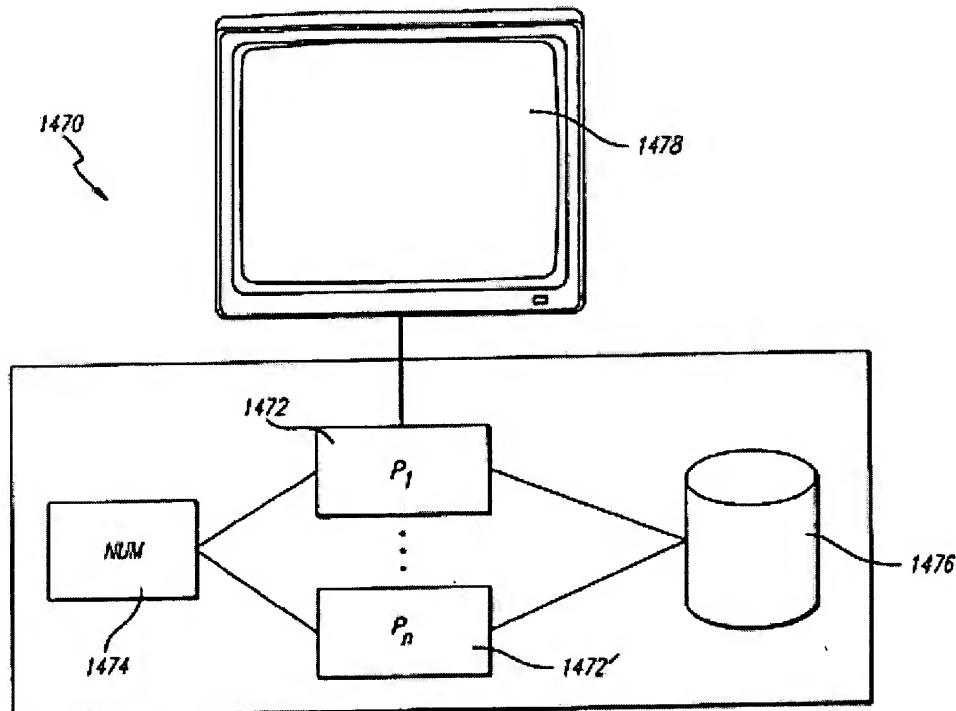


FIG. 55

Because Scepanovic’s multiple processors “1472, 1472” are unable to communicate with one another, Scepanovic does not teach, disclose or suggest “each processing unit of the plurality of processing units being able to **communicate** with one or more neighboring processing units” (emphasis added) as recited in Claim 1.

Hence, Claim 1 is patentable over Scepanovic and should be allowed by the Examiner. Claims 2-8, 12-19 and 25-27, at least based on their dependency on Claim 1, are also

believed to be patentable over Scepanovic.

Claim 38

Applicants submit that the Examiner has not shown that Scepanovic discloses, suggests or teaches, *inter alia*, the following features recited by Claim 38 of the present application:

“determining whether to exchange, between the processing unit and the pairing processing unit, the elements associated with the processing unit and the pairing processing unit” (emphasis added)

As stated above, Scepanovic’s multiple processors “1472, 1472” are not interconnected and are unable to communicate with one another. Because Scepanovic’s multiple processors “1472, 1472” are unable to communicate with one another, Scepanovic’s multiple processors “1472, 1472” are unable to “exchange … the elements associated with the processing unit and the pairing processing unit” (emphasis added) as recited in Claim 38.

Hence, Claim 38 is patentable over Scepanovic and should be allowed by the Examiner. Claims 39 and 46, at least based on their dependency on Claim 38, are also believed to be patentable over Scepanovic.

If the Examiner does not agree with Applicants interpretation of Scepanovic, the Examiner is encouraged to comply with 37 C.F.R. §1.104(c)(2) and “designate as nearly as practicable” where Scepanovic discloses that the multiple processors “1472, 1472” are able to “exchange … the elements associated with the processing unit and the pairing processing unit” (emphasis added) as recited in Claim 38.

Conclusion

In view of the above, reconsideration and allowance of all the claims are respectfully solicited.

The Commissioner is authorized to charge any additional fees which may be required or credit overpayment to deposit account no. 12-0415. In particular, if this response is not timely filed, then the Commissioner is authorized to treat this response as including a petition to extend the time period pursuant to 37 CFR 1.136 (a) requesting an extension of time of the number of months necessary to make this response timely filed and the petition fee due in connection therewith may be charged to deposit account no. 12-0415.

I hereby certify that this correspondence is being deposited with the United States Post Office with sufficient postage as first class mail in an envelope addressed to Mail Stop Amendment Commissioner for Patents POB 1450, Alexandria, VA 22313-1450 on

June 14, 2006
(Date of Deposit)

Shannon Tinsley
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June 14, 2006
(Date)

Respectfully submitted,



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